

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**MOTION SUBMITTING CERTIFIED TRANSLATIONS IN CONNECTION WITH
DOCKETED CLAIM OBJECTION RESPONSES TO BE HEARD AT THE
APRIL 25-26, 2023 ADJOURNED OBJECTION HEARING**

To the Honorable United States District Judge Laura Taylor Swain:

The Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the sole Title III representative of the Debtors pursuant to Section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),² respectfully files this motion in compliance with the Court’s March 22, 2023 *Order Regarding Pro Se Adjourned*

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (“Commonwealth”) (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² PROMESA is codified at 48 U.S.C. §§ 2101–2241.

Omnibus Objections to Claims of Unrepresented Claimants [ECF No. 23844] (the “Adjourned Objection Hearing Procedures Order”) directing the Oversight Board to file (i) any responses that were not filed on the docket and/or (ii) certified translations of any Spanish-language responses to claims that the Debtors intend to prosecute at the hearing to be held on April 25-26, 2023. Adjourned Objection Hearing Procedures Order at 2.

1. Attached hereto as **Exhibit 1** is a certified translation of the response [ECF No. 18818] filed by claimant Jose A. Figueroa Sierra in response to the *Three Hundred Eighty-Seventh Omnibus Objection (Substantive) of the Puerto Rico Electric Power Authority to Misclassified Claims* [ECF No. 17926].

2. Attached hereto as **Exhibit 2** is a certified translation of the response [ECF No. 19754] filed by claimant Carmen D. Carrasquillo in response to the *Three Hundred Ninety-Ninth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to No Liability Claims Filed by AEELA Members* [ECF No. 19548] (the “Three Hundred Ninety-Ninth Omnibus Objection”).

3. Attached hereto as **Exhibit 3** is a certified translation of the response [ECF No. 19725] filed by claimant Joel Negrón Guzmán in response to the *Three Hundred Ninety-Ninth Omnibus Objection*.

4. Attached hereto as **Exhibit 4** is a certified translation of the response [ECF No. 10721] filed by claimant Joel Negrón Guzmán in response to the *One Hundred Fourteenth Omnibus Objection (Non-Substantive) to Deficient Claims Asserting Interests Based Upon Unspecified Puerto Rico Statutes* [ECF No. 9564].

5. Attached hereto as **Exhibit 5** is a certified translation of the response [ECF No. 20288] filed by claimant Antonio Juan Marrero Borges in response to the *Four Hundred Third Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Sales Tax Financing Corporation to Employee Claims Asserting Liabilities Owed By Entities That Are Not Title III Debtors* [ECF No. 19552] (the “Four Hundred Third Omnibus Objection”).

6. Attached hereto as **Exhibit 6** is a certified translation of the response [ECF No. 19884] filed by claimant Xilma M. Acosta Diaz in response to the Four Hundred Third Omnibus Objection.

7. Attached hereto as **Exhibit 7** is a certified translation of the response [ECF No. 19827] filed by claimant Keirry del Carmen Alvarez Martinez in response to the Four Hundred Third Omnibus Objection.

8. Attached hereto as **Exhibit 8** is a certified translation of the response [ECF No. 19888] filed by claimant José Pérez Andino in response to the Four Hundred Third Omnibus Objection.

9. Attached hereto as **Exhibit 9** is a certified translation of the response [ECF No. 19891] filed by claimant William Narvaez Burgos in response to the Four Hundred Third Omnibus Objection.

10. Attached hereto as **Exhibit 10** is a certified translation of the response [ECF No. 19832] filed by claimant Heriberto Colon Correa in response to (1) the Four Hundred Third Omnibus Objection and (2) the *Four Hundred Fourth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Employee Claims Asserting Liabilities Owed By Entities That Are Not Title III Debtors* [ECF No. 19553] (the “Four Hundred Fourth Omnibus Objection”).

11. Attached hereto as **Exhibit 11** is a certified translation of the response [ECF No. 19752] filed by claimant Irma Colon Vega in response to the Four Hundred Third Omnibus Objection.

12. Attached hereto as **Exhibit 12** is a certified translation of the response [ECF No. 19852] filed by claimant Marta F. Colon in response to the Four Hundred Third Omnibus Objection.

13. Attached hereto as **Exhibit 13** is a certified translation of the response [ECF No. 20133] filed by claimant Marina Crispin Santiago in response to the Four Hundred Third Omnibus Objection.

14. Attached hereto as **Exhibit 14** is a certified translation of the response [ECF No. 19883] filed by claimant Alba N. Garcia in response to the Four Hundred Third Omnibus Objection.

15. Attached hereto as **Exhibit 15** is a certified translation of the response [ECF No. 19825] filed by claimant Nelson Heredia Alvarez in response to the Four Hundred Third Omnibus Objection.

16. Attached hereto as **Exhibit 16** is a certified translation of the response [ECF No. 19977] filed by claimant Felicita Hernandez Hernandez in response to the Four Hundred Third Omnibus Objection.

17. Attached hereto as **Exhibit 17** is a certified translation of the response [ECF No. 20062] filed by claimant Jose A. Maysonet in response to the Four Hundred Third Omnibus Objection.

18. Attached hereto as **Exhibit 18** is a certified translation of the response [ECF No. 19800] filed by claimant Milagros Morales Hernandez in response to the Four Hundred Third Omnibus Objection.

19. Attached hereto as **Exhibit 19** is a certified translation of the response [ECF No. 19821] filed by claimant Fredesvinda Ortiz Otero in response to the Four Hundred Third Omnibus Objection.

20. Attached hereto as **Exhibit 20** is a certified translation of the response [ECF No. 19801] filed by claimant Jacqueline Rosado Colon in response to the Four Hundred Third Omnibus Objection.

21. Attached hereto as **Exhibit 21** is a certified translation of the response [ECF No. 20061] filed by claimant Gladys Santos Martinez in response to the Four Hundred Third Omnibus Objection.

22. Attached hereto as **Exhibit 22** is a certified translation of the response [ECF Nos. 19729] filed by claimant Alicia Beniquez Toro in response to the Four Hundred Third Omnibus Objection.

23. Attached hereto as **Exhibit 23** is a certified translation of the response [ECF No. 19826] filed by claimant Lillian I. Torres Orraca in response to the Four Hundred Third Omnibus Objection.

24. Attached hereto as **Exhibit 24** is a certified translation of the response [ECF No. 19878] filed by claimant Emerina Torres Torres in response to the Four Hundred Third Omnibus Objection.

25. Attached hereto as **Exhibit 25** is a certified translation of the response [ECF No. 19881] filed by claimant Carmen D. Valdez Peralta in response to the Four Hundred Third Omnibus Objection.

26. Attached hereto as **Exhibit 26** is a certified translation of the response [ECF No. 19802] filed by claimant Maria Isabel Velazquez in response to the Four Hundred Third Omnibus Objection.

27. Attached hereto as **Exhibit 27** is a certified translation of the response [ECF No. 19829] filed by claimant Leticia Velez in response to the Four Hundred Third Omnibus Objection.

28. Attached hereto as **Exhibit 28** is a certified translation of the response [ECF No. 19753] filed by claimant Maria T. Ydrach Vivoni in response to the Four Hundred Third Omnibus Objection.

29. Attached hereto as **Exhibit 29** is a certified translation of the response [ECF No. 20472] filed by claimant Wanda I. Perez Lopez in response to the Four Hundred Third Omnibus Objection.

30. Attached hereto as **Exhibit 30** is a certified translation of the response [ECF No. 19824] filed by claimant William Lopez Torres in response to the Four Hundred Fourth Omnibus Objection.

31. Attached hereto as **Exhibit 31** is a certified translation of the response [ECF No. 19886] filed by claimant Yazmin Martinez Cole in response to the Four Hundred Fourth Omnibus Objection.

32. Attached hereto as **Exhibit 32** is a certified translation of the response [ECF No. 20121] filed by claimant Olga Santiago Arce in response to the Four Hundred Fourth Omnibus Objection.

33. Attached hereto as **Exhibit 33** is a certified translation of the response [ECF No. 20270] filed by claimant Salvador S. Rivera Pena in response to the Four Hundred Fourth Omnibus Objection.

34. Attached hereto as **Exhibit 34** is a certified translation of the response [ECF No. 21234] filed by claimant Maria Serrano Vazquez in response to the Four Hundred Fourth Omnibus Objection.

35. Attached hereto as **Exhibit 35** is a certified translation of the response [ECF No. 21235] filed by claimant Sylvia Vila Solano in response to the Four Hundred Fourth Omnibus Objection.

36. Attached hereto as **Exhibit 36** is a certified translation of the response [ECF No. 21236] filed by claimant Regina Cruz Davila in response to the Four Hundred Fourth Omnibus Objection.

37. Attached hereto as **Exhibit 37** is a certified translation of the response [ECF No. 21237] filed by claimant Doris Diaz de Gonzalez in response to the Four Hundred Fourth Omnibus Objection.

38. Attached hereto as **Exhibit 38** is a certified translation of the response [ECF No. 21238] filed by claimant Carmen Alicia Santiago Duco in response to the Four Hundred Fourth Omnibus Objection.

39. Attached hereto as **Exhibit 39** is a certified translation of the response [ECF No. 22884] filed by claimant Lourdes Febre Santiago in response to the Four Hundred Fourth Omnibus Objection.

40. Attached hereto as **Exhibit 40** is a certified translation of the response [ECF No. 22358] filed by claimant Arleen J. Nieves Correa in response to the Four Hundred Fourth Omnibus Objection.

41. Attached hereto as **Exhibit 41** is a certified translation of the response [ECF No. 19799] filed by claimant Marilyn Cintrón Serrano in response to the *Four Hundred Sixth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Duplicate Litigation Claims* [ECF No. 19555].

42. Attached hereto as **Exhibit 42** is a certified translation of the response [ECF No. 19726] filed by claimant Jorge Martinez Garcia in response to the *Four Hundred Twelfth Omnibus Objection (Non-Substantive) of the Puerto Rico Electric Power Authority to Deficient Claims* [ECF No. 19559].

43. Attached hereto as **Exhibit 43** is a certified translation of the response [ECF No. 20641] filed by claimant Rafael Carrasquillo Nieves in response to the *Four Hundred Thirty-Second Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Claims Asserted against the Incorrect Debtor* [ECF No. 20487] (the “**Four Hundred Thirty-Second Omnibus Objection**”).

44. Attached hereto as **Exhibit 44** is a certified translation of the response [ECF No. 22896] filed by claimant Ramón A. López Alvarado in response to the Four Hundred Thirty-Second Omnibus Objection.

45. Attached hereto as **Exhibit 45** is a certified translation of the response [ECF No. 21054] filed by claimant Irma Colon Vega in response to the *Four Hundred Thirty-Seventh*

Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Duplicate Claims [ECF No. 20495] (the “Four Hundred Thirty Seventh Omnibus Objection”).

46. Attached hereto as **Exhibit 46** is a certified translation of the response [ECF No. 21010] filed by claimant Alberto Vega Zayas in response to the Four Hundred Thirty-Seventh Omnibus Objection.

47. Attached hereto as **Exhibit 47** is a certified translation of the response [ECF No. 20601] filed by claimant Luz M. Acevedo Mercado in response to the *Four Hundred Forty-Third Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient ADR Claims* [ECF No. 20501].

48. Attached hereto as **Exhibit 48** is a certified translation of the response [ECF No. 21595] filed by claimant Benivette Rentas in response to the *Four Hundred Fifty-Third Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Highways and Transportation Authority to Claims Asserting Liabilities Owed by Entities That Are Not Title III Debtors* [ECF No. 20784].

49. Attached hereto as **Exhibit 49** is a certified translation of the response [ECF No. 21075] filed by claimant Miriam Sanchez Lebron in response to the *Four Hundred Sixty-Fifth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, the Puerto Rico Highways and Transportation Authority, and the Puerto Rico Public Buildings Authority to Claims for Which The Debtors Are Not Liable* [ECF No. 20796].

50. Attached hereto as **Exhibit 50** is a certified translation of the response [ECF No. 21799] filed by claimant Aurelio Moreno Soto in response to the *Four Hundred Seventy-Sixth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Duplicate Claims* [ECF No. 20791].

51. Attached hereto as **Exhibit 51** is a certified translation of the response [ECF No. 22600] filed by claimant Alicea Rodriguez Heliodora in response to the *Four Hundred Eighty-Fourth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Subsequently Amended and Superseded Claims* [ECF No. 21733].

52. Attached hereto as **Exhibit 52** is a certified translation of the response [ECF No. 22651] filed by claimant Nelson I. Maysonet Martinez in response to the *Five Hundred Fourteenth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Highways and Transportation Authority to Claims for Which The Debtors Are Not Liable* [ECF No. 22251] (the “Five Hundred Fourteenth Omnibus Objection”).

53. Attached hereto as **Exhibit 53** is a certified translation of the response [ECF No. 22652] filed by claimant Asunción Colón Ramos in response to the *Five Hundred Fourteenth Omnibus Objection*.

54. Attached hereto as **Exhibit 54** is a certified translation of the response [ECF No. 22653] filed by claimant Myrtelina Torres Berríos in response to the *Five Hundred Fourteenth Omnibus Objection*.

55. Attached hereto as **Exhibit 55** is a certified translation of the response [ECF No. 22654] filed by claimant Juan L. Dávila Pérez in response to the Five Hundred Fourteenth Omnibus Objection.

56. Attached hereto as **Exhibit 56** is a certified translation of the response [ECF No. 22655] filed by claimant Arnold Rodriguez Sanchez in response to the Five Hundred Fourteenth Omnibus Objection.

57. Attached hereto as **Exhibit 57** is a certified translation of the response [ECF No. 22656] filed by claimant Gerardo J. Ramos Velázquez in response to the Five Hundred Fourteenth Omnibus Objection.

58. Attached hereto as **Exhibit 58** is a certified translation of the response [ECF No. 22657] filed by claimant Raul Santini-Rivera in response to the Five Hundred Fourteenth Omnibus Objection.

59. Attached hereto as **Exhibit 59** is a certified translation of the response [ECF No. 23299] filed by claimant Luz Esther Rivera Cuevas in response to the *Five Hundred Twenty-Second Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico and the Puerto Rico Highways and Transportation Authority to Unliquidated Claims* [ECF No. 22257].

60. Attached hereto as **Exhibit 60** is a certified translation of the response [ECF No. 22852] filed by claimant Efran Márquez Guzmán in response to the *Thirty-Seventh Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico and the Puerto Rico Highways and Transportation Authority to Duplicate and No Liability Bond Claims* [ECF No. 22740].

61. Attached hereto as **Exhibit 61** is a certified translation of the response [ECF No. 22853] filed by claimant María V. Pérez Rodríguez in response to the *Five Hundred Thirty-Eighth*

Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Ric to Incorrect Debtor Claims [ECF No. 20501].

62. Attached hereto as **Exhibit 62** is a certified translation of the response [ECF No. 20646] filed by claimant Miriam Sanchez Lebron in response to the *Four Hundred Forty-Eighth Omnibus Objection (Substantive) of the Puerto Rico Electric Power Authority to Claims for Which It Is Not Liable* [ECF No. 20504].

Additional responses that were not filed on the docket, as well as certified translations thereof, are being submitted via notices of correspondence submitted contemporaneously herewith.

Courtesy copies of these certified translations will also be submitted to chambers in the electronic hearing binders the Oversight Board intends to submit on or before April 18, 2023 at 12:00 p.m. (Atlantic Standard Time) in compliance with the Adjourned Objection Hearing Procedures Order.

WHEREFORE, the Oversight Board respectfully requests that this Honorable Court take notice of the filing of these responses and certified translations in compliance with the Court's orders.

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Dated: April 11, 2023
San Juan, Puerto Rico

Respectfully submitted,

/s/ Brian S. Rosen

Martin J. Bienenstock

Brian S. Rosen

(Admitted *Pro Hac Vice*)

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